

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

ANGELA MAUNEY  
2602 Beech Orchard Lane  
Upper Marlboro, MD 20774

Plaintiff

v.

WASHINGTON METROPOLITAN  
AREA TRANSIT AUTHORITY  
Serve: Manager  
600 Fifth Street, N.W.  
Washington, DC 20001

Defendant

CAL

COMPLAINT

COMES NOW the Plaintiff, Angela Mauney, by and through her attorney, Erik D. Frye, and brings this complaint against the Defendant, Washington Metropolitan Area Transit Authority, herein after referred to as WMATA, and in support thereof, states as follows:

1. That Plaintiff, Angela Mauney, is an adult citizen of the United States and a resident of Prince George's County, Maryland.
2. That Defendant, Washington Metro Area Transit Authority (hereinafter "WMATA"), is a company licensed to conduct business in the State of Maryland, and was so conducting business on or about August 22, 2018.
3. That this incident occurred at the Largo Town Center Metro Station, located at 9000 Lottsford Road in Largo, located in Prince George's County, Maryland.
4. That the Largo Town Center Metro Station is maintained by WMATA.

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5. That on or about August 22, 2018, Plaintiff, Angela Mauney, was a business invitee at Largo Town Center Metro Station located on 9000 Lottsford Road in Largo, Prince George's County, Maryland, walking down the stairs in the metro station next to the escalator.

6. That on or about August 22, 2018, unbeknownst to the Plaintiff, Angela Mauney, a large pool of water had collected in the station near the escalators, creating an unreasonably dangerous condition.

7. That this pool of water was not open and obvious, but should have been discovered upon reasonable inspection.

8. That as the Plaintiff, Angela Mauney, was cautiously moving through the station towards the metro platform, she slipped on water or some type of liquid which was on the floor, causing her to fall and cut her leg.

9. That Defendant, WMATA, by and through its agents, servants, and/or employees knew, or in the exercise of due caution and diligence, should have known of the unreasonably dangerous condition, but failed to take any measures to protect and/or advise customers of its presence.

10. That Defendant, WMATA, owed the duty to the Plaintiff, Angela Mauney, to provide and maintain a safe premises, to inspect for dangerous hazards or conditions, and to warn the Plaintiff of any such hazards or conditions.

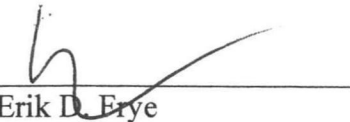
11. That Defendant, WMATA, breached their duty by failing to provide and maintain a safe premises, failing to adequately inspect the premises, and failing to warn the Plaintiff of an unreasonably dangerous condition.

12. That as a result of the Defendant's breach, Plaintiff was severely injured when she slipped and fell in the station.

13. That as a direct and proximate result of the negligence of the Defendant, the plaintiff, Angela Mauney, has suffered and will continue to suffer in the future severe physical injuries and mental anguish. Additionally, Plaintiff has expended and will continue to expend in the future vast sums for medical care and treatments, medicines, nursing service, physical therapy and other protracted medical-related attention. Further, Plaintiff has lost extensive wages and will continue to lose such wages in the future and thus presents a claim for past and future earnings loss and loss of earning capacity. Plaintiff is unable to perform her normal household duties and thus presents a claim for loss of home services. All the above damages were directly and proximately caused by the aforementioned negligence of the Defendant and were incurred without contributory negligence on the part of the Plaintiff or an opportunity for the Plaintiff, Angela Mauney, to avoid the incident.

**WHEREFORE**, Plaintiff, Angela Mauney, demands judgment against Defendant, Washington Metropolitan Area Transit Authority, in excess of Seventy-Five Thousand Dollars (\$75,000.00) plus costs.

Respectfully submitted,



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Attorney for Plaintiff